

REMARKS

I. Summary of Reply

Applicants have amended claims 1, 2, 6-12, 20-26, 39-58, 60, and 61 to more distinctly define the claimed invention, cancelled claims 27-30 and 59 without prejudice, and added new claims 62-65. The amended and new claims are fully supported by applicants' specification as originally filed. See, e.g., page 63, line 11 through page 69, line 19 of applicants' specification.

The Examiner's rejections are respectfully traversed.

II. Rejection of Claims under 35 U.S.C. § 103(a)

A. Independent Claims 1, 39, and 57

The claimed invention is directed to techniques for forming and displaying customized advertisements. Applicants' claim 1, for example, defines a technique for "receiving an advertisement," "determining, based on the received advertisement [and] viewer profile information, supplemental advertisement information," and, local to a user equipment, "customizing. . .the received advertisement to include the supplemental advertisement information" to form a customized advertisement.

Applicants submit that claims 1, 39, and 57, as amended, are patentable over the combination of Schein et al. U.S. Patent Application Pub. 2003/0005445 ("Schein"), Hendricks et al. U.S. Patent Application Pub. 2004/0111742 ("Hendricks"), and Coleman et al. U.S. Patent No. 5,844,620 ("Coleman") at least because the combination of these references does not show or render obvious applicants' feature of "determining, based on [a] received advertisement [and] viewer profile information, supplemental advertisement information" and "customizing, local [to] user equipment, the received advertisement to include the supplemental advertisement information to form a customized

advertisement" (hereinafter, "applicants' customization feature").

Schein does not disclose applicants' customization feature at least because Schein is silent on customizing a received advertisement locally at user equipment to include supplemental advertisement information. *See, e.g., Office Action*, page 3, lines 25-28 (where the Examiner acknowledges that Schein fails to disclose the local customization of advertisements). Further, Hendricks does not make up for the deficiencies of Schein at least because the targeted advertisements of Hendricks are not locally customized to include supplemental advertisement information. Instead, in Hendricks, one of a number of remotely predetermined advertisements is selected for display to a viewer. *See Hendricks*, paragraph 136, lines 1-13.

Coleman was cited by the Examiner as allegedly showing features that are not present in applicants' customization feature. Coleman does not make up for the deficiencies of Schein and Hendricks.

Therefore, because Schein, Hendricks, and Coleman each fail to disclose applicants' customization feature, the combination of these references does not show or render obvious applicants' claims 1, 39, and 57. Applicants respectfully request therefore that the rejection of claims 1, 39, and 57, and all of their dependent claims, under 35 U.S.C. § 103(a) be withdrawn.

B. Independent Claims 20 and 58

The claimed invention is directed to techniques for forming and displaying overlaid advertisements. Applicants' claim 20, for example, defines a technique for "retrieving [an] advertisement," "determining, based on the retrieved advertisement [and] viewer profile information, supplemental

advertisement information," and, local to a user equipment, "overlaying. . .the supplemental advertisement information onto the retrieved advertisement" to form a customized advertisement.

Applicants submit that claims 20 and 58, as amended, are patentable over the combination of Schein, Ellis et al. U.S. Patent Application Pub. 2008/0184315 ("Ellis"), and Coleman at least because the combination of these references does not show or render obvious applicants' feature of "determining, based on [a] retrieved advertisement [and] viewer profile information, supplemental advertisement information" and "overlaying, local [to] user equipment, the supplemental advertisement information onto the retrieved advertisement to form a customized advertisement" (hereinafter, "applicants' overlay feature").

Schein does not disclose applicants' overlay feature at least because Schein is silent on locally customizing a received advertisement, as described in Section II.A, above. Further, Ellis does not make up for the deficiencies of Schein at least because the overlay advertisements of Ellis are not locally customized to include supplemental advertisement information. Instead, in Ellis, a remotely predetermined overlay is displayed to a viewer. See *Ellis*, paragraph 230 and FIG. 43.

Coleman was cited by the Examiner as allegedly showing features that are not present in applicants' overlay feature. Coleman does not make up for the deficiencies of Schein and Ellis.

Therefore, because Schein, Ellis, and Coleman each fail to disclose applicants' overlay feature, the combination of these references does not show or render obvious applicants' claims 20 and 58. Applicants respectfully request therefore that the rejection of claims 20 and 58, and all of their dependent claims, under 35 U.S.C. § 103(a) be withdrawn.

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III. Conclusion

The foregoing demonstrates that this application is in condition for allowance. Reconsideration, entry of the proposed amendments, and prompt allowance of this application are accordingly respectfully requested.

Respectfully submitted,

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